



## **King County**

### **Executive Climate Office**

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November 5, 2025

Mr. Dustin Watson  
Department of Ecology  
Mobile Source Air Quality Specialist  
Olympia, WA 98504-7600

Submitted online via: <https://ecology.commentinput.com/?id=UAatGx2DEB>

**Re: ZEVergreen State Dialogue Sessions**

Dear Mr. Watson and Department of Ecology vehicle emissions standards staff:

Thank you for the opportunity to comment on strategies Washington State can take to promote zero emission vehicle adoption and clean transportation. Washington's low- and zero-emission vehicle standards are powerful regulatory tools to increase the sale of zero-emission vehicles over time. King County strongly supports Washington's participation in a multistate coalition to fight federal action to rescind State authority to regulate vehicle emission standards. King County appreciates the Department of Ecology's efforts to explore additional tools to keep expanding the adoption of zero-emission vehicles (ZEVs).

Confronting climate change and reducing emissions from the transportation sector are top priorities in King County's newly adopted 2025 Strategic Climate Action Plan (SCAP). The 2025 SCAP is a five-year blueprint for County climate action, sets ambitious targets to reduce emissions by half by 2030, lead with climate justice, and prepares for the impacts of climate change. King County's 2025 SCAP charts a vision for connected communities that are more compact and walkable, served by transit and zero-emission vehicles, collectively reducing GHG emissions and improving air quality and public health. The County also endorses and provides opportunities that connect frontline communities to living-wage employment in order to build a skilled and diverse workforce across the career spectrum. Future-facing technologies such as EVs and EV charging will provide access to the economic benefits tied to the clean energy transition, and the County encourages additional State development of such programs in the transportation sector.

Transportation is the largest source of greenhouse gas emissions in King County, and in Washington State, and we must take urgent and immediate action to lower emissions from

that sector. King County's analysis of pathways to achieve emission targets reveals implementation of the WA Vehicle Emission Standards as the policy measure with the largest potential to reduce transportation emissions through 2050. The 2025 SCAP commits King County to support efforts to protect adopted State Advanced Clean Cars and Clean Trucks standards, and advocate for the adoption of additional zero-emission vehicle standards, including Advanced Clean Fleet rules.

While the State has executed direct EV incentive and rebate programs, these are by their nature very expensive to implement and are likely to benefit several thousand successful applicants, versus the hundreds of thousands of Washingtonians that must still transition off combustion-based vehicles. For this reason, King County encourages the Department of Ecology to prioritize programs that can leverage funding available to significantly scale up deployment, such as technical capacity and contracting tools that facilitate more ZEV adoption.

In alignment with King County's commitments in the 2025 SCAP, King County encourages Washington State to support the following programs to expand the adoption of zero-emission vehicles:

**1. Expand public access and affordability of zero-emission vehicles and EV charging:**

Encourage reserving direct targeted investment in vehicles to transition the most polluting diesel vehicles (including school buses, port drayage vehicles) in the most overburdened areas and freight corridors. Prioritize programs that increase and elevate frontline community access to EV charging infrastructure. Ensure that public dollars support installations in "charging deserts," multi-family housing, and other overburdened areas not prioritized for buildout by private commercial networks. [King County 2025 SCAP – GHG 9]

Prioritize State legislative action that will improve access and reduce barriers and costs for the public to purchase and own an EV. King County encourages Washington State to allow direct sales for all EV manufacturers. King County encourages adoption of a road usage charge, so drivers pay for how much they drive, rather than penalizing and sending the wrong signal to EV owners with an annual EV registration fee.

**2. Accelerate public fleet zero-emission vehicle adoption:** King County is working to reduce transportation related emissions through electrification of County bus fleet and conversion to electric light-, medium- and heavy-duty vehicles across fleets. Encourage support for programs that accelerate efficient deployment to support large public and commercial fleets, such shared contracting tools, tax exemptions, charging hubs, and public-private EV charging partnerships that can assign some level of financial risk to commercial partners.

State contracts for zero-emission fleet vehicles, light-, medium-, and heavy-duty (MHD) vehicles facilitate access to new technology for specialized fleet vehicles. Including innovative vehicle technologies as part of State purchasing contracts (e.g., vehicle and equipment types that are not yet widely available from major manufacturers) could expand access while also creating additional demand in emerging markets.

Continue and consider opportunities to expand State contracts that local public agencies can join. For example, availability of the Energy Savings Performance Contracting (ESPC) procurement approach allows local government agencies to quickly access consultants and contractors with expertise to support emission reduction efforts, such as zero-emission charging installations. In the past, the County has also made use of DES cooperative contracts allowing for procurement of EV charging equipment, as well as installation and turnkey services, but current options support equipment purchase only. Given the challenges involved in finding qualified installers, we recommend these turnkey options be added back onto the roster.

Continue supporting grant programs that lower the financial barriers to electrification, particularly for sectors like medium- and heavy-duty vehicles that remain hard to electrify. For example, WSDOT's zero-emission vehicle grants, including the upcoming WAZIP program, and the Green Transportation Capital grants program for transit agencies. Continue the sales and use tax exemption for zero emission buses, transit agencies and federally recognized tribes. [King County 2025 SCAP – GHG 81, GH 82]

**3. Develop regional EV roadmaps:** To most efficiently identify the top priority locations for future EV chargers, and to develop a portfolio of sites suitable for submission to grant funding opportunities, planners need a charging roadmap customized for the region. An underlying mapping exercise, in coordination with underserved communities and community-based organizations, offers the opportunity to catalog existing charging, identify public EV “charging deserts” and develop a prioritized plan for improved access and investment. The Puget Sound region is currently collaborating to support research and publication of a regional EV charging implementation roadmap. Washington State could support similar regional plans for other parts of the state, and/or fund plans for all counties or cities across the state. [King County 2025 SCAP – GHG 9]

**4. Enhance Technical Assistance and Accelerator Programs for specific sectors:** Often rebate and grant programs alone are insufficient when there are technical capacity barriers for specific sectors to transition to EVs. King County has experience where private property owners were awarded Washington State grant funding through the County to install EV charging at multi-family housing. However, technical capacity barriers to implement the projects have resulted in many sites not moving forward and the reallocation of award funds. Similarly, property owners can be reluctant to pursue grant funding because they are unsure what is required to successfully install charging: multi-family property owners face unique user challenges; and commercial/freight operators struggle to match available EV technology with their operational needs.

There is an opportunity for Washington State to facilitate successful adoption of EV charging and EV vehicles in these more challenging sectors with additional technical assistance. For example, accelerator cohort programs where several property owners learn together from trusted messengers who have successfully implemented EV charging. In the commercial sector, an example from Quebec where the provincial government partnered with the Institute of Vehicle Innovation (IVI) to facilitate integration of EVs in commercial business through a series of feasibility assessments to identify candidates for short one-month pilots and then rebates for business with the best fit for the technology. Programs such as these

increase learning and readiness building capacity and networks in a specific industry. Several King County fleet managers participated in the Breaking Barriers Collaborative program and found it very useful to build capacity, develop shared understanding, and accelerate implementation. King County sees an opportunity to better leverage local government's ability to work directly with individual business and property owners to connect them to State-supported programs and is ready and eager to do so. [King County 2025 SCAP – GHG 9]

**5. Improve charger reliability:** One of the biggest challenges in using public chargers in King County, and in many places along the West Coast, is finding a reliable location where equipment is functioning properly and has not been vandalized. We encourage efforts to engage with agency and private partners to identify opportunities and funding to support emerging EV charger designs and/or technology that improve overall resilience, increase repairability, and enhance resistance to repeated vandalism. State legislative action is critical to combat EV charger vandalism and cable theft: more stringent enforcement is necessary to limit stolen copper from entering the resale market. Action to limit vandalism – the primary cause of damage to King County's public chargers – will allow for more rigorous uptime requirements and improve reliability and predictability of the public charging experience. [King County 2025 SCAP – GHG 9]

Thank you for your continued partnership in furthering Washington State's emissions reductions goals.

Sincerely,

A handwritten signature in black ink that reads "Marissa Aho". The signature is fluid and cursive, with the first name "Marissa" being more prominent than the last name "Aho".

Marissa Aho  
Director